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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

BRANDON VOGTS, an individual,

Plaintiff,

v.

EDVIN PIRVERDIAN, an individual;
and DOES 1-10,

Defendants.

Case No.

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

Jury Trial Demanded

Brandon Vogts, through counsel, hereby prays to this honorable Court for relief based on the following:

JURISDICTION AND VENUE

1. This action arises under the Copyright Act, 17 U.S.C. § 101, *et seq.*
2. This Court has federal question jurisdiction under 28 U.S.C. §§ 1331, 1338(a)-(b).
3. Venue in this judicial district is proper under 28 U.S.C. §§ 1391(c) and 1400(a) because a substantial part of the acts and omissions giving rise to the claims occurred in this judicial district.

PARTIES

4. Vogts is a professional photographer residing in Los Angeles, CA. Vogts specializes in photographing real estate and architecture.

1 5. Upon information and belief, Defendant Edvin Pirverdian is an
2 individual residing and/or maintaining principal places of business in this judicial
3 district at 6051 Varna Ave, Van Nuys, CA 91401; and 5920 Hillview Park Ave,
4 Valley Glen, CA 91401.


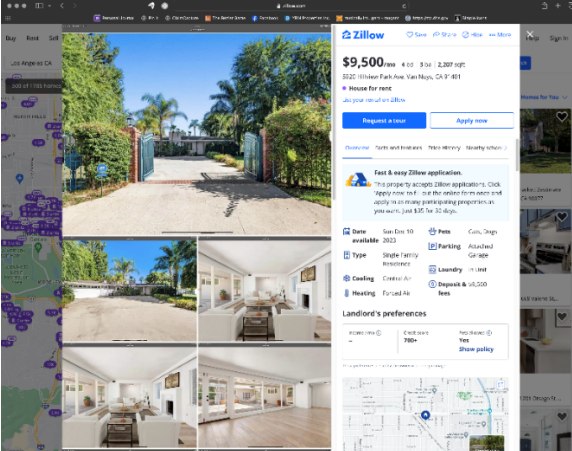

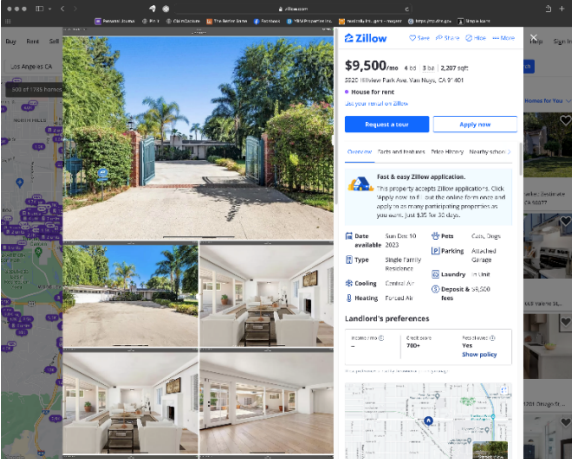

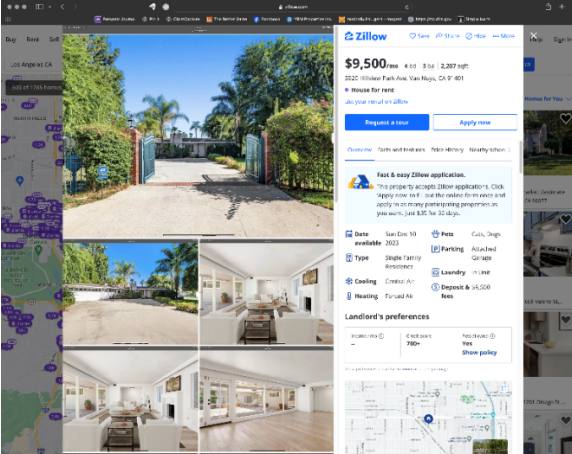
5 6. Upon information and belief, Defendants DOES 1-10 (collectively
6 with Pirverdian, “Defendants”), are other parties not yet identified who have
7 infringed Plaintiff’s copyrights, have contributed to the infringement of Plaintiff’s
8 copyrights, or have engaged in one or more of the wrongful acts alleged herein.
9 The true names, whether corporate, individual or otherwise, of DOE Defendants
10 are presently unknown to Plaintiff, who therefore sues said DOE Defendants by
11 such fictitious names, and will seek leave to amend this Complaint to show their
12 true names and capacities when the same have been ascertained.


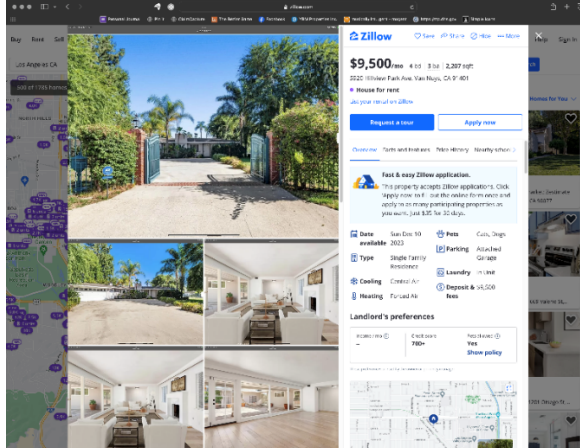

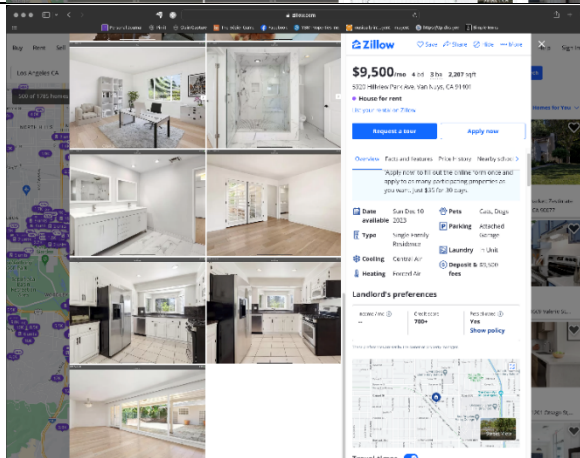

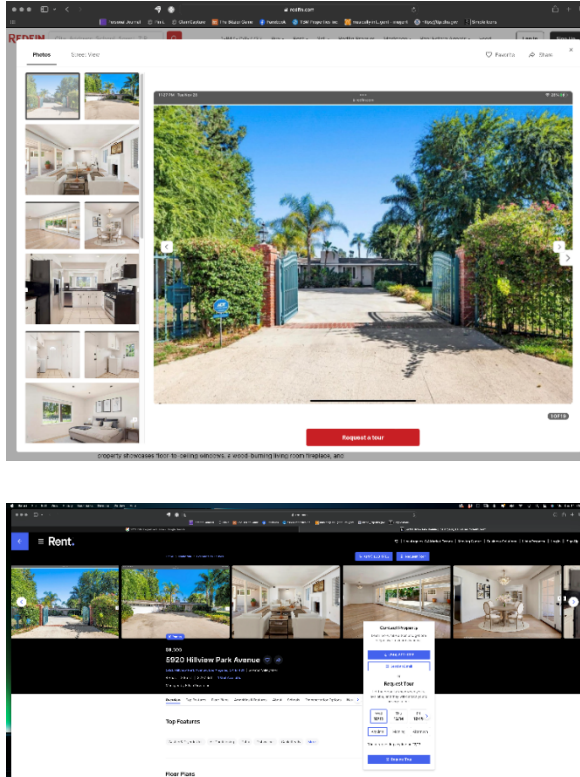
13 7. Upon information and belief, each of the Defendants was the agent,
14 affiliate, officer, director, manager, principal, alter-ego, and/or employee of the
15 remaining Defendants, and was at all times acting within the scope of such
16 agency, affiliation, alter-ego relationship, and/or employment; and actively
17 participated in, subsequently ratified, and/or adopted each of the acts or conduct
18 alleged, with full knowledge of each violation of Plaintiff’s rights and the
19 damages to Plaintiff proximately caused thereby.


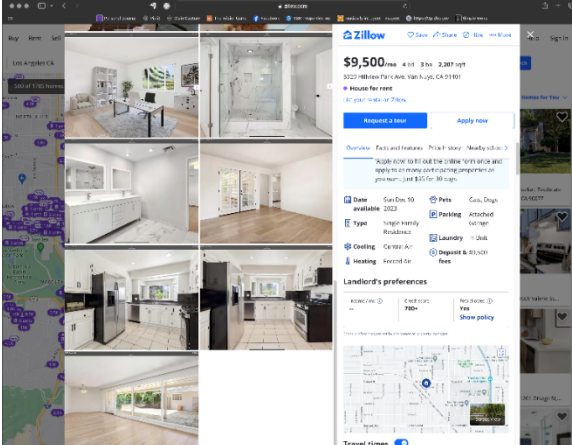

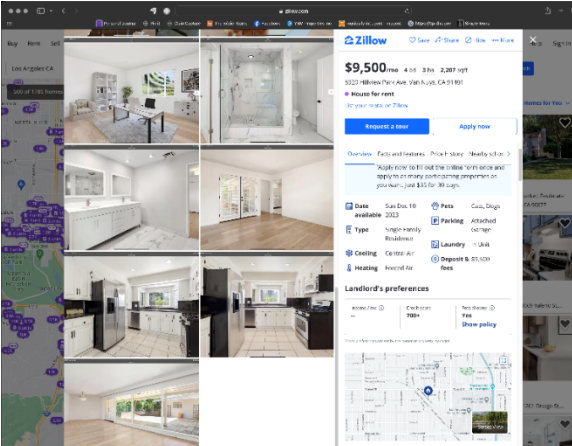

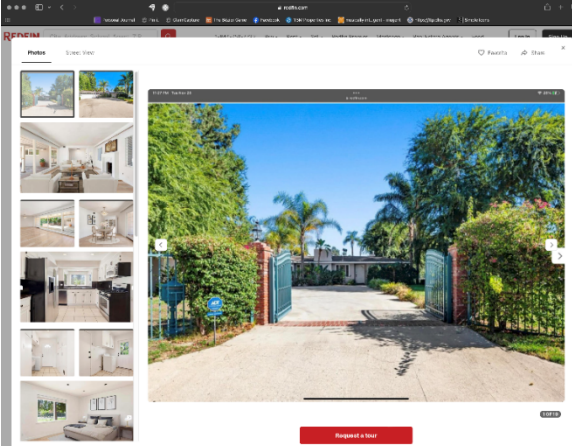
20 **DEFENDANTS’ UNAUTHORIZED EXPLOITATION OF**
21 **THE SUBJECT PHOTOGRAPHS**


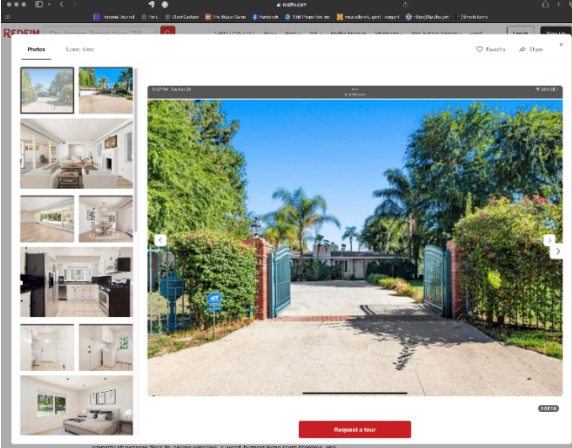

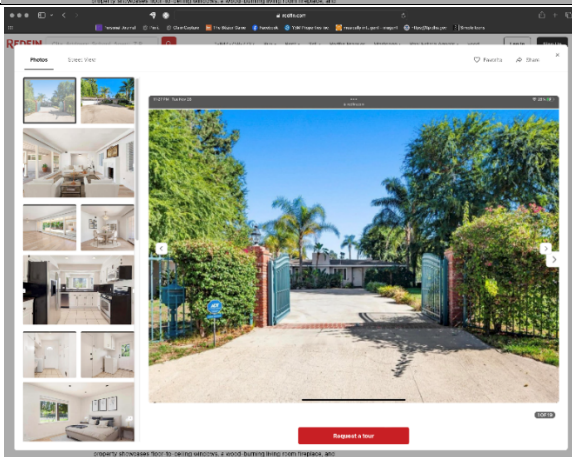

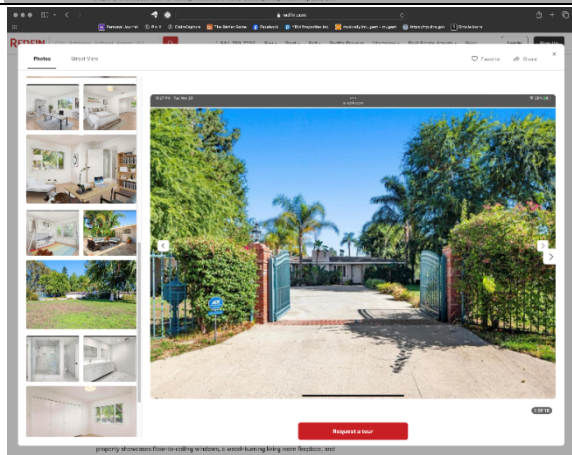
22 8. Vogts took and owns 21 original photographs registered with the U.S.
23 Copyright Office (collectively, the “Subject Photographs”).


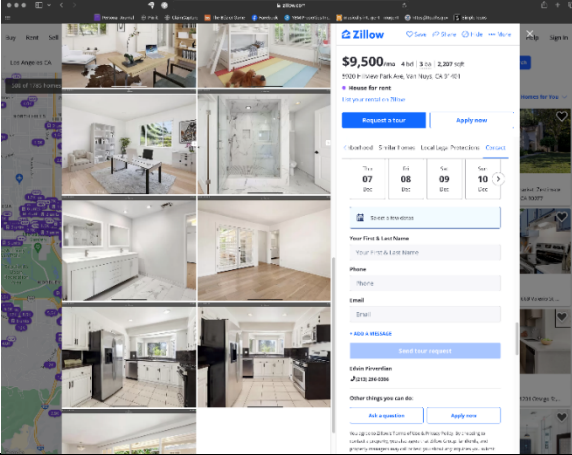

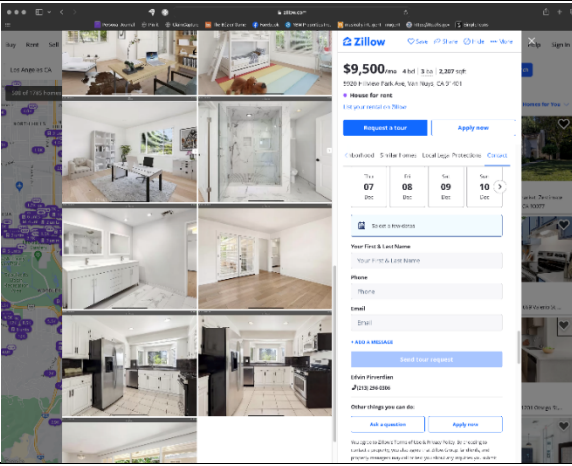

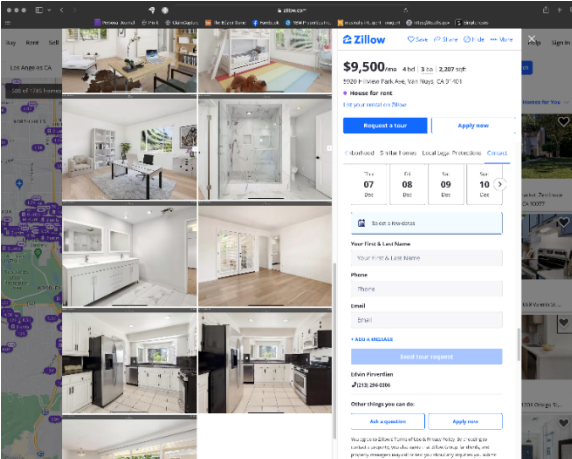
24 9. Following the publication and display of the Subject Photographs,
25 Defendants (and each of them) uploaded and displayed verbatim copies of the
26 Subject Photographs, in their entirety and for commercial purposes, on
27 zillow.com, redfin.com, and rent.com without Vogts’ permission (collectively, the
28 “Accused Posts”):


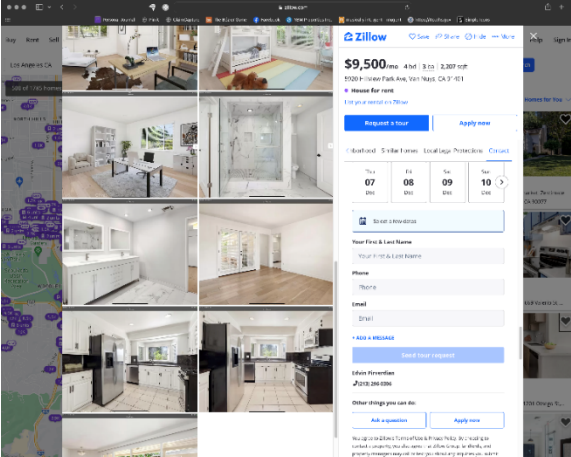

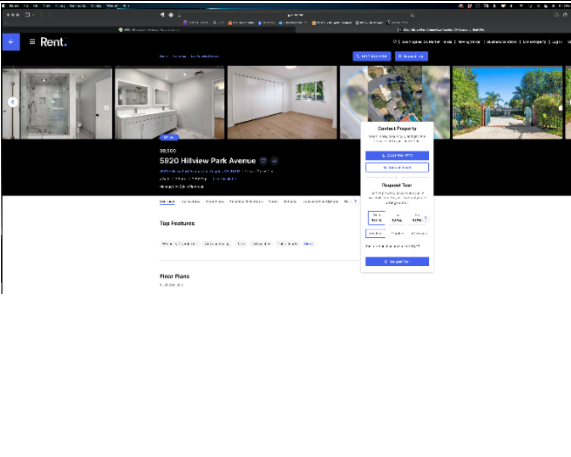

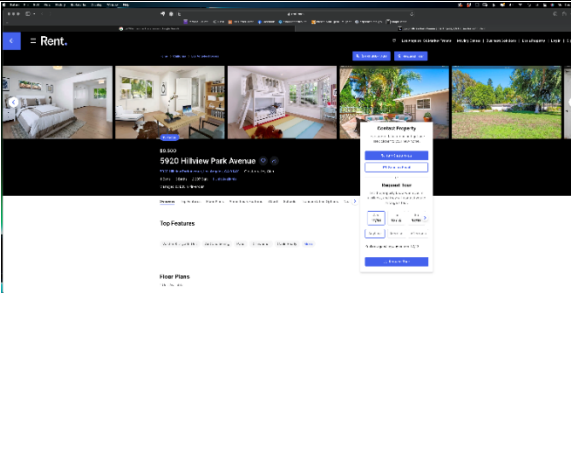

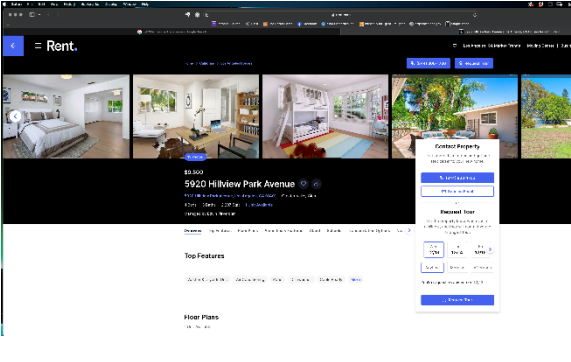
#	Subject Photographs	Accused Posts
1	 <p data-bbox="272 638 824 722">20230830_5920_Hillview_Park_Ave_001</p>	
2	 <p data-bbox="272 1092 824 1184">20230830_5920_Hillview_Park_Ave_002-2</p>	
3	 <p data-bbox="272 1554 824 1640">20230830_5920_Hillview_Park_Ave_004</p>	


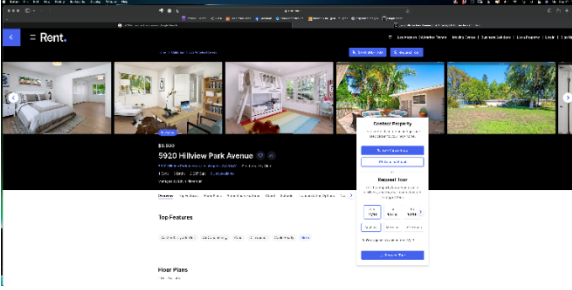

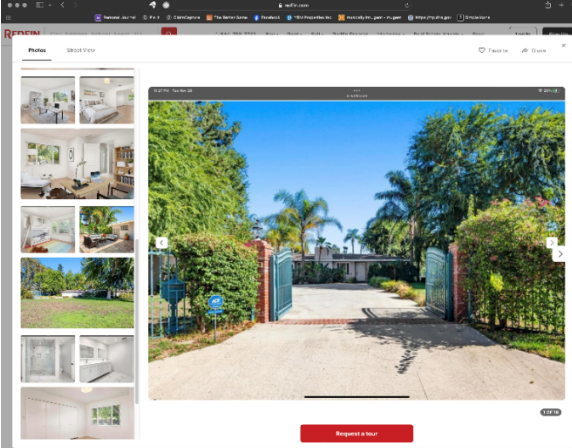
#	Subject Photographs	Accused Posts
4	 <p data-bbox="267 577 829 655">20230830_5920_Hillview_Park_Ave_005</p>	
5	 <p data-bbox="267 1039 829 1117">20230830_5920_Hillview_Park_Ave_006</p>	
6	 <p data-bbox="267 1509 829 1587">20230830_5920_Hillview_Park_Ave_008</p>	

#	Subject Photographs	Accused Posts
7	 <p data-bbox="266 575 824 653">20230830_5920_Hillview_Park_Ave_009</p>	
8	 <p data-bbox="266 1031 824 1108">20230830_5920_Hillview_Park_Ave_010</p>	
9	 <p data-bbox="266 1495 824 1572">20230830_5920_Hillview_Park_Ave_012</p>	

#	Subject Photographs	Accused Posts
10	 <p data-bbox="272 573 824 657">20230830_5920_Hillview_Park_Ave_013</p>	
11	 <p data-bbox="272 1031 824 1110">20230830_5920_Hillview_Park_Ave_015</p>	
12	 <p data-bbox="272 1484 824 1564">20230830_5920_Hillview_Park_Ave_018</p>	

#	Subject Photographs	Accused Posts
13	 <p data-bbox="272 577 824 663">20230830_5920_Hillview_Park_Ave_019</p>	
14	 <p data-bbox="272 1029 824 1125">20230830_5920_Hillview_Park_Ave_021</p>	
15	 <p data-bbox="272 1491 824 1581">20230830_5920_Hillview_Park_Ave_022</p>	

#	Subject Photographs	Accused Posts
1 2 3 4 5 6 7 8	 <p data-bbox="272 577 824 663">20230830_5920_Hillview_Park_Ave_024</p>	
9 10 11 12 13 14 15	 <p data-bbox="272 1035 824 1121">20230830_5920_Hillview_Park_Ave_026</p>	
16 17 18 19 20 21 22	 <p data-bbox="272 1493 824 1579">20230830_5920_Hillview_Park_Ave_028</p>	
23 24 25 26 27 28		

#	Subject Photographs	Accused Posts
	20230830_5920_Hillview_Park_Ave_031	
20	 <p data-bbox="264 701 842 783">20230830_5920_Hillview_Park_Ave_040</p>	
21	 <p data-bbox="264 1157 842 1241">20230830_5920_Hillview_Park_Ave_042</p>	

10. In December 2023, Vogts sent correspondence to Pirveredian demanding that he remove the Accused Posts and provide information regarding the unauthorized exploitation of the Subject Photographs to explore an amicable resolution without litigation. The parties were unable to reach such a resolution, necessitating this action.

FIRST CLAIM FOR RELIEF

(For Copyright Infringement – Against All Defendants, and Each)

11. Plaintiff incorporates by reference the allegations contained in the preceding paragraphs of this Complaint.

- 1 d. That Plaintiff be awarded pre-judgment interest as allowed by law;
2 e. That Plaintiff be awarded such further relief as the Court deems
3 proper.

4 **JURY DEMAND**

5 Plaintiff demands a jury trial on all issues so triable pursuant to Fed. R. Civ.
6 P. 38 and the 7th Amendment to the United States Constitution.

7
8 Dated: April 30, 2024

DONIGER / BURROUGHS

9 By: /s/ Stephen M. Doniger
10 Stephen M. Doniger, Esq.
11 Benjamin F. Tookey, Esq.
12 *Attorneys for Plaintiff*
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